

Exhibit B

Plaintiff's Requests for Production of Documents to Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Michele Swetland	:	
1315 Bruce Road	:	
Oreland, PA 19075	:	
	Plaintiff	12-cv-02474
Vs.	:	
PHILIPS AND COHEN	:	
AND ASSOCIATES	:	
1002 JUSTISON STREET	:	
WILMINGTON, DE 19801	:	Jury Trial Demanded
and	:	
John Does 1-10	:	
and	:	
XYZ Corporations,	:	
	Defendant(s)	:

**PLAINTIFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS
AND THINGS PROPOUNDED TO DEFENDANT(S)**

To: Defendant(s):

Kindly serve responses to these requests for production of documents upon Plaintiff's Attorney, Vicki Piontek, Esquire, 951 Allentown Road, Lansdale, PA 19466. You may send the responses by email, fax or regular mail. Please provide responses within 30 days of your receipt of these requests for production of documents or within 30 days of the case management conference, whichever is later.

1. Copies of any and all documents, emails, faxes or electronically stored information pertaining to the account(s) which is the subject of this action.
2. Copies of all written correspondence of any kind whatsoever, including fax email or other forms of written communication, from the Defendant(s) to the original alleged creditor for the account which is the subject of this action.

3. Copies of all written correspondence of any kind whatsoever, including fax email or other forms of written communication, from the original alleged creditor to Defendant for the account which is the subject of this action.
4. Copies of all recorded telephone conversations between Plaintiff and Defendant(s).
5. Copies of all records of any kind whatsoever (written or electronic) showing outgoing and incoming calls from Defendant to Plaintiff.
5. Copies of any insurance policies which Defendant currently has or had at the time of that Defendant(s) contacted Plaintiff by telephone.
6. Copie(s) of any and all corporate charter, articles of incorporation, or other documents used to establish Defendant(s) as a business entity.
7. Copie(s) of any and all corporate charter, articles of incorporation, or other documents used to establish Defendant(s) parent company(ies) as a business entity(ies).
8. Copies of training materials used in connection with Defendant(s)' employees engage in any and all types of collection activity.

9. Copies of any and all materials provided to Defendant(s) by the original creditor for the account(s) which is the subject of this action.
10. Any and all documents to indicate how Defendant(s) obtained the telephone number(s) used to contact Plaintiff.

Wherefore, please respond by furnishing the requested information and documents within thirty days of receipt of these requests for production of documents.

Respectfully Submitted,

Vicki Piontek
Vicki Piontek, Esquire
Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
palaw@justice.com
877-737-8617
Fax: 866-408-6735

5-29-2012
Date of Service

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Michele Swetland
1315 Bruce Road
Oreland, PA 19075

Plaintiff :

Vs.

PHILIPS AND COHEN
AND ASSOCIATES
1002 JUSTISON STREET
WILMINGTON, DE 19801
and
John Does 1-10
and
XYZ Corporations,

Defendant(s) :

12-cv-02474

Jury Trial Demanded

VERIFICATION

I, _____, have read the answers to the attached requests for production of documents. Under penalty of Federal Law, I affirm that the answers stated are true and correct to the best of my knowledge, understanding and belief.

Signature

Date

Name

Title

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Michele Swetland :
1315 Bruce Road :
Oreland, PA 19075 :
Plaintiff :
Vs. : **12-cv-02474**
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WILMINGTON, DE 19801 :
and : Jury Trial Demanded
John Does 1-10 :
and :
XYZ Corporations, :
Defendant(s) :

CERTIFICATE OF SERVICE

Attorney Vicki Piontek affirms that she is the attorney for the above captioned Plaintiff, and that she sent by First Class U.S. Mail, postage pre-paid a true and correct copy of the attached requests for production of documents to the following parties at the following addresses.

AARON R. EASLEY, ESQUIRE
SESSIONS FISHMAN NATHAN ISRAEL LLC
200 ROUTE 31 NORTH SUITE 203
FLEMINGTON, NJ 08822

Vicki Piontek

Vicki Piontek, Esquire

Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
877-737-8617
palaw@justice.com
Fax: 866-408-6735

5/29/12

Date of service